

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CO2 SOLUTIONS INC.,)	
)	
Plaintiff,)	
)	Civil Action No. 1:15-cv-01123-SLR
v.)	
)	
AKERMIN, INC.,)	
)	
Defendant.)	

AKERMIN'S MOTION TO TRANSFER VENUE UNDER 28 U.S.C. § 1404(a)

Dated: March 25, 2016

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AKERMIN'S MOTION TO TRANSFER VENUE UNDER 28 U.S.C. § 1404(a)

Under 28 U.S.C. § 1404(a) and “[f]or the convenience of parties and witnesses,” defendant Akermin, Inc. (“Akermin”) respectfully moves this Court to transfer this case to the United States District Court for the Eastern District of Missouri. A transfer is in the interest of justice at this early stage of the proceedings as this lawsuit has no material connection to Delaware.

The Eastern District of Missouri is an appropriate forum for this case as the action is one that could have originally been brought there. Further, the balance of the private and public interest factors identified in *Jumara v. State Farm Ins. Co.*, 55 F.3d 873 (3d Cir. 1995) strongly favors transferring this case to the Eastern District of Missouri. The grounds for this motion are set forth in the accompanying brief in support.

Dated: March 25, 2016

Respectfully submitted,

PANITCH SCHWARZE BELISARIO & NADEL
LLP

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing to all registered participants.


Patricia Smink Rogowski